

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DONALD BEASLEY, Individually and On Behalf of All Others Similarly Situated,	:	Civil Action No. 1:08-cv-00913-LTS
Plaintiff,	:	<u>CLASS ACTION</u>
vs.	:	
TELETECH HOLDINGS, INC., et al.,	:	
Defendants.	:	
WILLIAM BROWN, Individually and On Behalf of All Others Similarly Situated,	:	Civil Action No. 1:08-cv-01842-LTS
Plaintiff,	:	<u>CLASS ACTION</u>
vs.	:	
TELETECH HOLDINGS, INC., et al.,	:	
Defendants.	:	

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investor Electrical Workers Local #357 Pension and Health & Welfare Trusts (“Electrical Workers Local #357”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Electrical Workers Local #357 as Lead Plaintiff; (iii) approving Electrical Workers Local #357’s selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Electrical Workers Local #357 submits herewith a Memorandum of Law and Declaration of Mario Alba Jr., dated March 25, 2008.

DATED: March 25, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

/s/ Mario Alba Jr.

MARIO ALBA JR.

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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on March 25, 2008, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Electrical Workers Local #357 Pension And Health & Welfare Trusts For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel; and

Declaration Of Mario Alba Jr. In Support Of The Motion Of Electrical Workers Local #357 Pension And Health & Welfare Trusts For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

TELETECH HOLDINGS

Service List - 3/20/2008 (08-0051)

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TELETECH HOLDINGS

Service List - 3/20/2008 (08-0051)

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vs.	:	
TELETECH HOLDINGS, INC., et al.,	:	
Defendants.	:	

[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD
PLAINTIFF AND APPROVING SELECTION OF LEAD COUNSEL

Having considered the Motion of Electrical Workers Local #357 Pension and Health & Welfare Trusts (“Electrical Workers Local #357”) for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefore:

1. The Actions are hereby consolidated;
2. Electrical Workers Local #357 is hereby appointed Lead Plaintiff for the Class pursuant to Section 27 of the Securities Act of 1933 and Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE LAURA T. SWAIN
UNITED STATES DISTRICT JUDGE

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